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*Attorneys for Defendants
Brian Bentley, Andrew Bentley,
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Payment Services, LLC*

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

CS Wang & Associate, Sat Narayan dba Express
Hauling, Robert Meyer dba Mangia Nosh, and
Taysir Tayeh dba Chief's Market, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

Wells Fargo Bank, N.A., Fifth Third Bank, First
Data Merchant Services, LLC, Vantiv, Inc.,
National Processing Company, International
Payment Services, LLC dba ElitePay Global and
dba PrimePay Global, Brian Bentley, Andrew
Bentley, Adam Bentley, Ironwood Financial, LLC
dba Ironwood Payments, DeWitt Lovelace, and
John Lewis,

Defendants.

**AMENDED MOTION FOR ORDER
DISMISSING THE IPS DEFENDANTS**

Civil No. 1:16-cv-11223

Judge Rebecca R. Pallmeyer

Pursuant to Rule 21 of the Federal Rules of Civil Procedure, Defendants International
Payment Services, LLC, Brian Bentley, Andrew Bentley, and Adam Bentley (the "IPS
Defendants") respectfully request that this Court enter an order dismissing Plaintiffs' claims

against the Bentleys with prejudice, and dismissing the Plaintiffs' claims against IPS without prejudice. Rule 21 of the Federal Rules of Civil Procedure authorizes the Court to "drop a party" from the case "at any time, on just terms." On February 5, 2019, Plaintiffs filed an amended stipulation of voluntary dismissal, dismissing any and all claims against the Bentleys with prejudice and on the merits, and dismissing any and all claims against IPS without prejudice. *See* Am. Stip. of Vol. Dismissal, Dkt. No. 279. Accordingly, the IPS Defendants respectfully request that this Court dismiss Plaintiffs' claims against the Bentleys with prejudice, dismiss Plaintiffs' claims against IPS without prejudice, and dismiss each of the IPS Defendants from this case.

DATED this 6th day of February 2019.

Respectfully submitted,
**MANNING CURTIS BRADSHAW &
BEDNAR PLLC**

/s/ Jess M. Krannich
Jess M. Krannich
*Attorneys for Defendants Brian Bentley,
Andrew Bentley, Adam Bentley, and
International Payment Services, LLC*

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he caused a copy of the attached **AMENDED MOTION FOR ORDER DISMISSING THE IPS DEFENDANTS** to be electronically filed with the Clerk of the Court on February 6, 2019. Notice of this filing will be served upon counsel of record via Electronic Notification by the District Court's ECF Filing System.

/s/ Jess M. Krannich
Jess M. Krannich